

THE KELLY FIRM, P.C.

Andrew J. Kelly, Esq.
Stephen A. Schwimmer, Esq.
1011 Highway 71, Suite 200
Spring Lake, New Jersey 07762
(732) 449-0525
akelly@kbtlaw.com
sschwimmer@kbtlaw.com
Attorneys for the Debtor-in-Possession, 6 Sunset Lane, LLC

| | |
|---|---|
| <p>IN RE:</p> <p>6 SUNSET LANE, LLC,</p> <p>Debtor-in-Possession.</p> | <p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <hr/> <p>Chapter 11</p> <p>Case No. 25-11005-MEH</p> <p>Judge: Hon. Mark E. Hall, U.S.B.J.</p> <p>NOTICE OF MOTION FOR AN ORDER EXPUNGING CLAIM 3</p> <p>Hearing Date: June 16, 2025 at 10:00a.m.</p> |
|---|---|

TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

SIR/MADAM:

PLEASE TAKE NOTICE, that on June 16, 2025, at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for the Debtor, 6 Sunset Lane, LLC (the “Debtor”), will move before the Honorable Mark E. Hall, United States Bankruptcy Judge, at the United States Bankruptcy Court, 402 East State Street, Courtroom #2, Trenton, New Jersey 08608, for an Order expunging Claim 3 pursuant to 11 U.S.C. §502.

PLEASE TAKE FURTHER NOTICE, that the undersigned will rely upon the Certification of Frank Rubba submitted herewith in support of the requested relief.

PLEASE TAKE FURTHER NOTICE, that in accordance with D.N.J. L.B.R. 9013-1(f), the Debtor specifically waives oral argument unless timely opposition is filed, whereupon the Debtor specifically requests oral argument.

PLEASE TAKE FURTHER NOTICE, that in accordance with D.N.J. L.B.R. 9013-1(e), no brief is necessary in support of this Motion in as much as no difficult or novel issues are raised. In the event such issues are raised, Debtor reserves the right to file an appropriate brief within any time period set by the Court.

PLEASE TAKE FURTHER NOTICE, that a proposed form of Order is annexed hereto.

THE KELLY FIRM, P.C.
Attorneys for Debtor-in-Possession,
6 Sunset Lane, LLC

Dated: May 22, 2025

By: /s/ Stephen A. Schwimmer
STEPHEN A. SCHWIMMER